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May 23, 2008.

Clerk's Office
United States Bankruptcy Court
District of New Jersey
P.O. Box 2067
Camden, N.J. 08101

Re: Delair Group, L.L.C.
Case #: 08-14634

Dear Sir/Madam,

Enclosed herewith, please find the previously filed Motion of Creditor Jennifer Sheehan to Lift Stay with certification of the hearing date which is scheduled for June 9, 2008 at 10:00 a.m.

Very truly yours,



Barry C. Reed, Jr.

U.S. BANKRUPTCY COURT
FILED
CAMDEN, NJ
08 MAY 27 AM 9:42
JAMES J. WALDRON
BY: DEPUTY CLERK

U.S. BANKRUPTCY COURT
FILED
CAMDEN, NJ

08 MAY 19 AM 9:14

UNITED STATES BANKRUPTCY COURT

JAMES J. WALDRON DISTRICT OF NEW JERSEY

BY: mb
DEPUTY CLERK

A Hearing on this matter will be held
on 6/9/08 at 10:00 am
Michael H. Cohen U.S. Courthouse
400 Cooper Street
Camden, NJ 08101
Courtroom 4C

DELAIR GROUP, L.L.C.

C.A. NO. 08-14634 (GMB)

CERTIFICATION OF SERVICE OF THE
MOTION WITH THIS DATE IS REQUIRED
PRIOR TO THE HEARING DATE OR THE
MOTION WILL BE DENIED.

MOTION OF CREDITOR JENNIFER SHEEHAN TO LIFT STAY

Now comes creditor, Jennifer Sheehan, and requests that this Court grant her motion to lift the automatic stay with respect to the debtor, Delair Group, L.L.C.

As grounds, creditor Jennifer Sheehan states that she filed a personal injury/products liability action against Delair L.L.C. relating to injuries sustained in a pool accident which occurred in August 2002. Delair L.L.C. is the manufacturer of the subject pool.

It is Jennifer Sheehan's counsel understanding that Delair, L.L.C. has a commercial insurance policy with limits up to 25 million dollars. In the event of a successful verdict and/or settlement, Jennifer Sheehan will only look to the insurance policy for reimbursement. Ms. Sheehan will not look to the assets of Delair L.L.C. in anyway.

For the above stated reasons, the creditor Jennifer Sheehan requests that she be allowed to pursue her personal injury case which is currently on appeal at the United States Court of Appeal for the First Circuit, Docket # 08-1519.

The creditor,
Jennifer Sheehan,
by her attorneys,



Barry C. Reed, Jr.
Reed & Giordano
101 Tremont Street, Suite 900
Boston, MA 02108

CERTIFICATE OF SERVICE

I, Barry C. Reed Jr., hereby certify that on this date I served copies of **Motion to Lift Stay** by mailing a copy of Same, first class postage prepaid to:

Joseph V. Cavanagh, Jr., Esq.
Blish & Cavanagh, LLP
30 Exchange Terrace
Providence, RI 02903

Signed under the pains and penalties of perjury.



Barry C. Reed, Jr.
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101 Tremont Street
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Dated: May 16, 2008

CERTIFICATE OF SERVICE

I, Barry C. Reed, Jr., hereby certify that on this date that I served a copy of the **Motion of Creditor Jennifer Sheehan to Lift Stay** which sets forth that a hearing is to be held on this matter on 6-9-08 at 10:00 a.m. at the U.S. Court House, 400 Cooper Street, Camden, N.J. 08101, Court Room 4-C, by mailing a copy of same, first class postage prepaid to each of the parties or counsel listed on the attached Service List.



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Dated: May 23, 2008.

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